

State of Florida



ORIGINAL

Public Service Commission

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TALLAHASSEE, FLORIDA 32399-0850

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SEP 18 PM 1:

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COMMISSION  
CLERK

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**DATE:** September 18, 2006  
**TO:** Blanca S. Bayó, Commission Clerk and Administrative Services Director  
**FROM:** Lee Eng Tan, Attorney, Office of the General Counsel *LET*  
**RE:** Docket No. 060502-TI - Compliance investigation of World-Link Solutions, Inc. d/b/a WL Solutions, Inc. for apparent violation of Rules 25-4.118, FAC, Local, Local Toll, or Toll Provider Selection; and 25-24.475, FAC, Company Operations and Customer Relations.

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Please place the attached documents in the above-reference docket file.

TLT/Attachment

- CMP \_\_\_\_\_
- COM \_\_\_\_\_
- CTR \_\_\_\_\_
- ECR \_\_\_\_\_
- GCL \_\_\_\_\_
- OPC \_\_\_\_\_
- RCA \_\_\_\_\_
- SCR \_\_\_\_\_
- SGA \_\_\_\_\_
- SEC   1
- OTH \_\_\_\_\_

DOCUMENT NUMBER-DATE

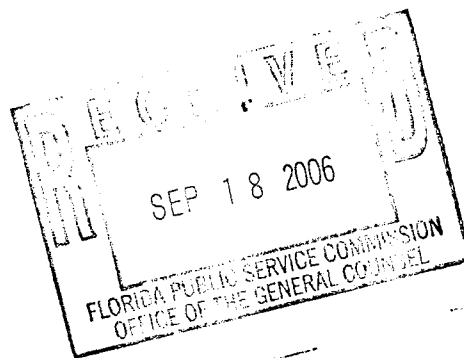
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FPSC-COMMISSION CLERK

# THE HELEIN LAW GROUP, P.C.

8180 Greensboro Drive  
Suite 775  
McLean, Virginia 22102

Telephone: (703) 714-1300  
Facsimile: (703) 714-1330  
E-mail: [mail@thlglaw.com](mailto:mail@thlglaw.com)  
Website: [www.THLGlaw.com](http://www.THLGlaw.com)



Writer's Direct Dial Number  
(703) 714-1313

Writer's E-mail Address  
[ism@thlglaw.com](mailto:ism@thlglaw.com)

September 15, 2006

## VIA E-MAIL & OVERNIGHT DELIVERY

Lee Eng Tan  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399

**Re: *World-Link Solutions, Inc.***  
***Docket No. 060502-TI***

Dear Lee Eng:

World-Link Solutions, Inc. ("WLS"), through undersigned counsel, hereby presents staff of the Florida Public Service Commission ("Commission") with certain information regarding a proposed resolution of Docket No. 060502-TI.

As you recall, WLS and Commission staff identified and agreed to a six-point plan for settlement. These six-points are as follows:

1. WLS agreement to make voluntary contribution to Florida General Fund in the amount of \$3,500; \$2,000 of which for an alleged "slamming" violation; \$1,500 for an alleged "failure to respond" violation;
2. WLS agreement to change contact person on the Commission's Master List by removing Paul Stamoulis as primary contact for regulatory and consumer issues and replacing Mr. Stamoulis with Iulian Ionescu, Vice President of Finance, as "consumer issues" contact and Jonathan S. Marashlian as primary "regulatory issue" contact;
3. Agreement to submit copy of Third Party Verification script and Telemarketing or Marketing script;
4. If PSC staff identifies any deficiencies in the scripts, WLS agreement to make changes to the extent necessary;
5. Agreement to file statement agreeing to adhere to all FL statutes and PSC rules in future; and

6. Agreement to send letter to customer explaining that all charges have been forgiven, all efforts to collect ceased, and confirm there has been no impact on customer's credit bureau rating.

WLS has previously agreed to satisfy all six-points of the proposed settlement plan and hereby provides the following additional information in hopes of furthering this matter towards completion:

**POINT 1:**

WLS confirms its acceptance of the financial terms of the proposed settlement and stands prepared to make the voluntary contribution at the appropriate time.

**POINT 2:**

WLS confirms its request to change the primary contacts on the Commission's Master List as follows:

**Primary Consumer Issues Contact:**

Iulian Ionescu  
VP Finance  
World-Link Holding, Inc.  
42 Broadway, 8th Floor, Suite 1101  
New York, NY 10004  
Phone: 212-444-3000 x3005  
Fax: 718-741-8041  
E-Mail: [Iulian.Ionescu@world-link.net](mailto:Iulian.Ionescu@world-link.net)

**Primary Regulatory Issues Contact:**

Jonathan S. Marashlian  
The Helein Law Group, P.C.  
8180 Greensboro Drive, Suite 775  
McLean, Virginia 22102  
Office Tel: 703-714-1313  
Office Fax: 703-714-1330  
E-Fax: 703-991-2557  
E-Mail: [jsm@thlglaw.com](mailto:jsm@thlglaw.com)

**POINT 3:**

Copies of relevant TPV and Marketing Scripts attached hereto at Exhibit 1.

**POINT 4:**

To the extent Commission staff recommends changes to the TPV and/or Marketing Scripts, WLS confirms its willingness to make modifications.

**POINT 5:**

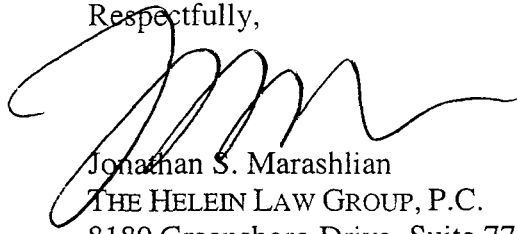
WLS agrees to comply with all rules and regulations of the Florida Public Service Commission now and in the future.

**POINT 6:**

WLS agrees to send letter to complainant, Mr. Downs, explaining that all charges have been forgiven, all efforts to collect ceased, and confirm there has been no impact on customer's credit bureau rating. See draft letter attached hereto at Exhibit 2.

We sincerely look forward to receiving your comments and moving forward with settlement as soon as practicable.

Respectfully,

A handwritten signature in black ink, appearing to read 'JSM', with a long, sweeping flourish extending to the right.

Jonathan S. Marashlian  
THE HELEIN LAW GROUP, P.C.  
8180 Greensboro Drive, Suite 775  
McLean, VA 22102  
Tel: 703-714-1313  
Fax: 703-714-1330  
E-mail: [jsm@thlglaw.com](mailto:jsm@thlglaw.com)

**LIST OF EXHIBITS**

EXHIBIT 1	TPV and Marketing Scripts
EXHIBIT 2	Draft Letter

EXHIBIT 1

Please enter your representative identification number followed by the # key.  
(Enter your own 4-digits Agent or Rep ID and press #)



Thank you for using the Voicelog verification system

For Local, Regional and Long distance, press 1

(If the customer signs up for Local package which is included local, intarlata (within state), and interlata (state to state and international) services press 1)

For Long Distance and Regional Long Distance, press 2.

(If the customer signs up for intarlata (within state), and interlata (state to state and international) services press 2)

For Long Distance ONLY press 3.

(If the customer signs up only for interlata (state to state and international) service press 3)

This recorded call will confirm your selection of World Link as your Local, Regional and Long Distance provider.

This recorded call will confirm your selection of World Link as your Long Distance and Regional Long Distance provider.

This recorded call will confirm your selection of World Link as your Long Distance provider.

Please enter the customer's 10 digits billing telephone number followed by the "#" key  
(Enter customer's 10- digits telephone number starting from are code and then press #)



The number you have entered is xxx-xxx-xxxx

(Listen carefully if customer's number was entered correctly)

To continue, press 1.

(If customer's number was entered correctly, press 1)

To correct, press 2.

(If customer's number was entered incorrectly and you want to correct it, press 2)

If there are additional numbers, press 1.

(If the customer signs up for more than one phone number for the same service as for first one, press 1)

Otherwise, press 9.

(If the customer doesn't want to add any additional phone numbers, press 9)

Customer, the next 4 questions are for you. At the tone, please state your name, and then press the # key  
(At the tone the customer has to say his/her first and last name and press #)

At the tone, please state your address, and then press the # key

(At the tone the customer has to say his/her full billing address and press #)

To confirm that you are over 18 and authorized to make decisions for these phone numbers, please state your social security number and then press the # key.

(At the tone the customer has to say his/her number of Social Security and press #)



You understand that unless you receive a confirmation within 10 days of subscribing to World Link Local, Regional and Long Distance Direct Dial Service you should assume that all these services have not been

switched to World Link Solutions. You understand that World Link Solutions will not be responsible for any Local, Regional and Long distance charges incurred by you prior to your lines being switched to World Link Solutions. To confirm your understanding, please say "yes" and press the # key.  
(If the customer signs up for Local package which is included local, intralata (within state), and interlata (state to state and international) services)

You understand that unless you receive a confirmation within 10 days of subscribing to World Link Direct Dial Service you should assume that your long distance and regional long distance services have not been switched to World Link Solutions. You understand that World Link Solutions will not be responsible for any distance and regional long distance services charges incurred by you prior to your lines being switched to World Link Solutions. To confirm your understanding, please say "yes" and press the # key  
(If the customer signs up for intralata (within state), and interlata (state to state and international) services)

You understand that unless you receive a confirmation within 10 days of subscribing to World Link Direct Dial Service you should assume that your long distance and service has not been switched to World Link Solutions. You understand that World Link Solutions will not be responsible for any distance service charges incurred by you prior to your lines being switched to World Link Solutions. To confirm your understanding, please say "yes" and press the # key.  
(If the customer signs up only for interlata (state to state and international) service)

→ The record identification number is: xxx-xxxx  
(You hear identification number of Voice Verification that just was done)

↓

To repeat, press 1  
(If the customer wants to get the record identification number again, press 1)  
To exit, press 2.  
(To finish Voice Verification process, press 2)

↓

Thank you for using the Voicelog verification system and thank you for choosing World-Link Solutions  
(Voice Verification process is completed, you can hang up the phone)



Por favor marque su codigo de acceso seguido de la tecla numeral ubicada debajo de el 9.  
(You should enter your own 4-digits Agent ID code and press #)



Gracias por usar el sistema de verificacion Voicelog

Para Local, Regional y Larga Distancia, presione 1

(If the customer signs up for Local package which is included local, intarlata (within state), and interlata (state to state and international) services press 1)

Para Larga Distancia y Larga Distancia Regional, presione 2

(If the customer signs up for intarlata (within state), and interlata (state to state and international) services press 2)

Para Larga Distancia SOLAMENTE, presione 3

(If the customer signs up only for interlata (state to state and international) service press 3)

Esta grabacion confirmara su seleccion de World Link como su proveedor de Servicio Local, Regional y de Larga Distancia.

You hear it if the customer signs up for Local package which is included local, intarlata (within state), and interlata (state to state and international) services)

Esta grabacion confirmara su seleccion de World Link como su proveedor de Larga Distancia, y de Larga Distancia Regional

(You hear it if the customer signs up for intarlata (within state), and interlata (state to state and international) services)

Esta grabacion confirmara su seleccion de World Link como su compañía de Larga Distancia

(You hear it if the customer signs up only for interlata (state to state and international) service)

Por favor marque los 10 digitos del # telefono del usuario, seguido de la tecla #

(Enter customer's 10- digits telephone number starting from area code and then press #)



El numero que usted marco es xxx-xxx-xxxx

(Listen carefully if customer's number was entered correctly)

Para continuar, marque 1

(If customer's number was entered correctly, press 1)

Para correguir, marque 2

(If customer's number was entered incorrectly and you want to correct it, press 2)

Si Ud tiene numeros adicionales, presione 1

(If the customer signs up for more than one phone number for the same service as for first one, press 1)

Si no, marque 9

(If the customer doesn't want to add any additional phone numbers, press 9)

Usuario, las proximas 4 preguntas son para ud. Al oir el tono, por favor diga su nombre y presione la tecla #  
(At the tone the customer has to say his/her first and last name and press #)

Al oir el tono, por favor diga su direccion, y presione la tecla #

(At the tone the customer has to say his/her full billing address and press #)



Para confirmar que Usted es mayor de 18 años y autorizado para tomar decisiones por estos numeros telefonicos, por favor diga su numero de Seguro Social o su fecha de nacimiento y su apellido materno y luego presione la tecla #  
(At the tone the customer has to say his/her number of Social Security or date of birth and mother's maiden name and press #)



Ud entiende que a menos que Ud reciba una confirmacion luego de 10 dias de suscribirse a los servicios de Local, Regional y Larga Distancia Discado Directo, Ud debe asumir que todos estos servicios no han sido cambiados a World-Link Solutions. Ud entiende que World-Link Solutions no sera responsable por cualquier cargo que Ud incurra, por servicio Local, Regional y de Larga Distancia antes que sus lineas sean cambiadas a World-Link Solutions. Para confirmar su entendimiento, por favor diga 'si' y presione la tecla #.  
(You hear it if the customer signs up for Local package which is included local, intarlata (within state), and interlata (state to state and international) services)

Ud entiende que a menos que Ud reciba una confirmacion luego de 10 dias de suscribirse a los servicios de Discado Directo y Discado Directo Regional. Ud debe asumir que estos servicios de larga distancia y larga distancia regional no han sido cambiados a World-Link Solutions. Ud entiende que WLS, no sera responsable p cualquier cargo que Ud incurra, antes que sus lineas sean cambiadas a World-Link Solutions. Para confirmar su entendimiento, por favor diga 'si' y presione la tecla #.  
(You hear it if the customer signs up for intarlata (within state), and interlata (state to state and international) services)

Ud entiende que a menos que ud reciba una confirmacion luego de 10 dias de suscribirse al Servicio de Discado Directo de World-Link Solutions. Ud debe asumir que su servicio de larga distancia no ha sido cambiado a World-Link Solutions. Ud entiende que WLS no sera responsable por cualquier cargo de servicio de larga distancia incurrido por Ud antes que sus lineas sean cambiadas a World-Link Solutions. Para confirmar su entendimiento, por favor diga 'si' y presione la tecla #.  
(You hear it if the customer signs up only for interlata (state to state and international) service)

→ El numero de identificacion de esta grabacion es: xxx-xxxx  
(You hear identification number of Voice Verification that just was done)

↓  
Para repetir, presione 1  
(If the customer wants to get the record identification number again, press 1)  
Para salir del sistema, presione 2  
(To finish Voice Verification process, press 2)

↓  
Gracias por usar el sistema de verificacion Voicelog y gracias por escoger a World-Link Solution  
(Voice Verification process is completed, you can hang up the phone)

World-Link Solutions

Gracias por llamar al departamento de calidad y verificación de órdenes de World Link Solutions, le habla \_\_\_\_\_, Esta conversación será grabada para fines de calidad.

1. Podría **confirmar** su **nombre** por favor.
2. Podría confirmar por favor el **número de teléfono con código de área** que desea suscribir al servicio local, regional y larga distancia de World Link Solutions
3. Podría usted confirmar el **nombre del dueño** de la línea telefónica a suscribir, por favor.
4. Confirменos por favor su **dirección completa**.
5. Podría confirmar que usted es mayor de 18 años de edad y es dueño(a) de la línea telefónica o autorizada para tomar decisiones sobre esta?
6. Confirme por favor su número de **seguro social** o su **fecha de nacimiento** y **apellido materno**.
7. Sr. \_\_\_\_\_ usted esta confirmando su decisión de elegir a **World Link Solutions como su proveedor único del servicio Local, Regional y de Larga Distancia**, el plan que esta seleccionando tendrá un costo de **39.95 al mes mas cargos e impuestos**, e incluye Llamadas Locales, Regionales y de Larga Distancia Ilimitadas dentro de Estados Unidos además del Identificador de Llamadas, Llamada en Espera y la Conferencia de Llamadas. Como oferta promocional con su suscripción obtendrá **un descuento de \$20 Dólares en su primera factura**. Este plan **NO incluye las llamadas GRATIS a Puerto Rico, Hawai, Alaska, Islas Vírgenes, ni llamadas internacionales**, las cuales serán cobradas por minuto con base en las tarifas vigentes estándar de World-Link. **Esta usted de acuerdo con esta orden?**
8. **Responda con un claro SI que, usted entiende** que deberá confirmar la activación de su servicio telefónico con World-Link llamando a Nuestro **Departamento de Servicio al Cliente al 1-877-255-7428 en 10 días laborales**. UD entiende que World Link no será responsable por cualquier cargo que usted incurra por el servicio local, regional y larga distancia antes que su servicio sea activado con World-Link.
9. Como complemento a su servicio telefónico de World-Link le **ofrecemos una tarjeta de llamadas para usar desde su celular con nuestras bajísimas tarifas internacionales** por minuto que serán cargadas a su factura telefónica mensual de World-Link. **Para usar su tarjeta de llamadas desde su celular, siempre deberá marcar el 1-877-837-0182** seguido el número de teléfono que desea llamar.
10. Cualquier pregunta relacionada al plan que UD esta eligiendo actualmente, puede hacerla en estos momentos o llamar a nuestro Departamento de servicio al cliente en español abierto **los 7 días de la semana de 8am-12pm**.

Gracias por preferir el servicio de World Link y que tenga un buen resto del día

**TPV 703-857-2231 Clave: 33175**

EXHIBIT 2

[WLS LETTERHEAD]

Date

Mr. and Mrs. Fred Downs  
[Address]

RE: Your World-Link Solutions, Inc. Long Distance Account

Dear Mr. and Mrs. Downs:

This letter is to inform you of certain matters regarding your long distance account with World-Link Solutions, Inc. ("World-Link"), which you previously terminated. No action is required on your part.

First, World-Link wishes to apologize for any inconveniences it may have caused you. Second, World-Link advises you that your account has been fully credited back all charges you may have incurred while subscribed to World-Link's long distance services. Third, we wish to inform you that you may ignore and discard the demand for payment/debt collection letter from Butler, Robbins & White as all efforts to collect the amount of \$203.08 or any other amount associated with your World-Link account has been suspended. Lastly, we want to advise you that none of the collection efforts undertaken by World-Link, either directly or indirectly, through Butler, Robbins & White, have or will have any impact on your credit rating with any credit bureaus. World-Link confirms that there has been and will not be any impact on your credit rating because the alleged debt and any efforts to collect said debt were not and will not be referred to any credit bureau.

Thank you for being a World-Link subscriber. We hope you are fully satisfied with our resolution of this matter.

Cordially,

World-Link Solutions, Inc.